

Hon. Robert J. Bryan

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

LAWRENCE HARTFORD; DOUGLAS  
MITCHELL; BRETT BASS; SPORTING  
SYSTEMS VANCOUVER, INC.; SECOND  
AMENDMENT FOUNDATION; AND  
FIREARMS POLICY COALITION, INC.,

*Plaintiffs,*

v.

BOB FERGUSON, in his official capacity as  
Washington State Attorney General; JOHN R.  
BATISTE, in his official capacity as Chief of the  
Washington State Patrol; JOHN GESE, in his  
official capacity as Sheriff for Kitsap County,  
Washington; CLAYTON MYERS, in his official  
capacity as Sheriff for Kittitas County,  
Washington; JOHN HORCH, in his official  
capacity as Sheriff for Clark County,  
Washington; ADAM FORTNOY, in his official  
capacity as Sheriff for Snohomish County,  
Washington; CHAD M. ENRIGHT, in his  
official capacity as County Prosecutor for Kitsap  
County, Washington; GREG ZEMPEL, in his  
official capacity as County Prosecutor for  
Kittitas County, Washington; TONY GOLIK,  
in his official capacity as County Prosecutor for  
Clark County, Washington; and JASON  
CUMMINGS, in his official capacity as County  
Prosecutor for Snohomish County, Washington,

*Defendants.*

No. 3:23-cv-05364-RJB

DECLARATION OF  
ALAN GOTTLIEB  
IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
PRELIMINARY INJUNCTION

1 I, Alan Gottlieb, declare as follows:

2 1. I make this declaration in support of my Motion for Preliminary Injunction. I am  
3 over the age of 18, have personal knowledge of the matters stated herein and, if called upon, I could  
4 and would competently testify thereto.

5 2. I am the Executive Vice-President of Second Amendment Foundation.

6 3. Second Amendment Foundation is a nonprofit educational foundation that seeks to  
7 preserve the effectiveness of the Second Amendment through education, research, publishing, and  
8 legal action programs focused on the constitutionally protected right to possess firearms and  
9 firearm ammunition, and the consequences of gun control.

10 4. Second Amendment Foundation has thousands of members in Washington,  
11 including the named Plaintiffs, and brings this action to vindicate the rights of its members.

12 5. I am prepared to testify to the foregoing at trial of this matter.

13 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury of the laws of the United States  
14 that the foregoing is true and correct.

15 Signed this 4<sup>th</sup> day of May, 2023, at BELLEVUE, WASHINGTON

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18 Alan Gottlieb  
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